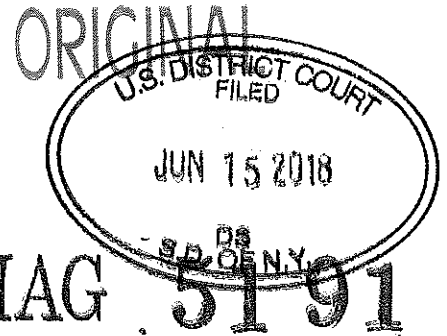


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Approved: Matthew Hellman
MATTHEW HELLMAN / JACOB WARREN
Assistant United States Attorneys

Before: THE HONORABLE GARIEL W. GORENSTEIN
United States Magistrate Judge
Southern District of New York



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UNITED STATES OF AMERICA

: SEALED COMPLAINT

- v. -

: Violations of 18 U.S.C.
§§ 924(c), and 2; 21

ANTONIO TIRADO,

: U.S.C. §§ 841(a),
841(b) (1) (C),

Defendant.

: 841(b) (1) (D)

: COUNTY OF OFFENSE:
BRONX

- - - - - X

SOUTHERN DISTRICT OF NEW YORK, ss.:

GREGORY STEMKOWSKI, being duly sworn, deposes and says that he is a Special Agent with the Department of Homeland Security, Homeland Security Investigations ("HSI"), and charges as follows:

COUNT ONE

(Distribution and Possession with Intent to Distribute a
Controlled Substance)

1. On or about July 20, 2017, in the Southern District of New York, and elsewhere, ANTONIO TIRADO, the defendant, intentionally and knowingly did distribute and did possess with intent to distribute controlled substances, in violation of 21 U.S.C. § 841(a) (1).

2. The controlled substances involved in the offense were mixtures and substances containing (1) a detectable amount of cocaine, in violation of 21 U.S.C. § 841(b) (1) (C); (2) a detectable amount of lysergic acid diethylamide, commonly referred to as "LSD", in violation of 21 U.S.C. § 841(b) (1) (C); and (3) a detectable amount of marijuana, in violation of 21

U.S.C. § 841(b)(1)(D).

(Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(C), 841(b)(1)(D), and Title 18, United States Code, Section 2.)

COUNT TWO

(Possession of a Firearm in Furtherance of a Drug Trafficking Crime)

3. On or about July 20, 2017, in the Southern District of New York, and elsewhere, ANTONIO TIRADO, during and in relation to a drug trafficking crime for which he may be prosecuted in a court of the United States, namely, the offense charged in Count One of this Complaint, knowingly did use and carry a firearm, and, in furtherance of such crime, did possess a firearm.

(Title 18, United States Code, Sections 924(c)(1)(A)(i) and 2.)

The bases for my knowledge and the foregoing charges are, in part, as follows:

4. I am a Special Agent with HSI and have been so employed for approximately 10 years. I have been involved in the investigation of this matter. My duties and responsibilities include the investigation of firearms and drug offenses, among other crimes. I base this affidavit on that personal experience, as well as on my conversations with other law enforcement agents, and my examination of various reports and records. Because this affidavit is being submitted for the limited purpose of demonstrating probable cause, it does not include all the facts that I have learned during the course of my investigation. Where the contents of documents and the actions, statements, and conversations of others are reported herein, they are reported in substance and in part, except where otherwise indicated.

5. I am aware that on or about July 19, 2017, the Honorable Sarah Netburn, United States Magistrate Judge, granted a request for a search warrant (the "Warrant") authorizing a search of a particular apartment on Oliver Place in the Bronx (the "Premises").

6. On or about July 20, 2017, members of HSI, agents from the Drug Enforcement Administration ("DEA"), the United States Postal Inspection Service ("USPIS"), and Customs and Border Protection ("CBP"), executed the Warrant at the Premises. Based on my investigation, including conversations with agents who executed the Warrant at the Premises, including, among other agents, an agent with USPIS ("Agent-1") I have learned, among other things, the following:

a. When executing the Warrant at the Premises, Agent-1 observed ANTONIO TIRADO, the defendant, to be inside a living room within the Premises. TIRADO then led Agent-1 to a bedroom within the Premises ("Bedroom-1"). TIRADO stated, among other things and in substance and in part, that he was a resident of the Premises; that Bedroom-1 was TIRADO's bedroom; and that TIRADO was the sole occupant of Bedroom-1.

b. Inside Bedroom-1, Agent-1 observed, among other things, the following:

i. One Mossberg Shotgun loaded with five shotgun shells, and a box containing nineteen additional shotgun shells.

ii. Numerous clear plastic bags each containing a vegetative substance, which vegetative substance had an aggregate weight of approximately 977 grams.

iii. A metal cabinet containing, among other things, ultraviolet heat lamps, a cooling and dehumidifying atmospheric control interface, watering devices, and three plants whose vegetation was consistent with that of marijuana, which plants were of an aggregate weight of 960 grams.

iv. Numerous clear plastic bags containing papers with a brightly colored chemical residue.

v. One clear plastic bag containing a green plastic bag which contained a white powdery substance, which white powdery substance had an aggregate weight of approximately 35 grams.

vi. One clear plastic bag containing a silver wrapping which contained a white powdery substance, which white powdery substance had an aggregate weight of approximately 29 grams.

vii. One clear plastic bag containing tan crystals, which tan crystals had an aggregate weight of approximately 30 grams.

viii. One clear plastic bag containing a hard powdery substance, which hard powdery substance had an aggregate weight of approximately 30 grams.

ix. Approximately ten United States Postal Service Priority Mail shipping boxes, not yet sealed, each individually labeled with a return address of "DSTM Ent Services" at a particular address in Yonkers, New York, and addressed to individual addresses in locations including Texas, North Carolina, Michigan, New Jersey, Nebraska, California, Tennessee, and Louisiana. At least 7 of the shipping boxes were further found to contain identical plastic hairbrushes and no other items. The bristles of the hairbrushes were removable, and by removing the bristles of at least one of the hairbrushes, Agent-1 observed the hairbrush to contain the green plastic bag listed in (b)(v), above.

x. Shipping materials including a labeling printer and United States Postal Service mailing envelopes.

xi. Numerous packaging and storage containers, including, among other things, hundreds of zip-loc plastic bags, aluminum foil, a "Foodsaver" heat and vacuum sealing device and numerous compatible plastic bags.

xii. Four digital scales.

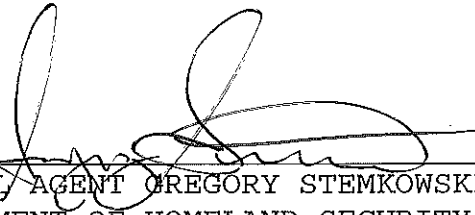
xiii. Paraphernalia including, among other things, pipes, cigarette and cigar rolling papers, a metal grinder.

xiv. A New York State Driver's License in the name "Antonio Tirado" bearing a photograph of TIRADO, as well as banking and other access devices bearing the name "Antonio Tirado."


c. Based on Agent-1's training and experience, Agent-1 believes the vegetative substance listed above in (b)(ii) appears to be marijuana; the plants listed above in (b)(iii) appear to be marijuana plants; the chemical residue listed above in (b)(iv) appears to contain LSD; and the white powdery substance listed above in (b)(v) and (b)(vi) appears to be cocaine. Furthermore, based on Agent-1's training and experience, the substances described above are packaged and/or

in preparation for distribution. Moreover, based on Agent-1's training and experience, he believes the devices described above in (b)(iii) are used for growing and harvesting marijuana; and that the scales, packaging, sealing, and shipping materials are used for preparing and packaging controlled substances for distribution.

WHEREFORE, the deponent respectfully requests that a warrant issue for the arrest of ANTONIO TIRADO, the defendant, and that he be arrested and imprisoned, or bailed, as the case may be.


SPECIAL AGENT GREGORY STEMKOWSKI
DEPARTMENT OF HOMELAND SECURITY
HOMELAND SECURITY INVESTIGATIONS

Sworn to before me this
15th day of June, 2018


THE HONORABLE GABRIEL W. GORENSTEIN
UNITED STATES MAGISTRATE JUDGE
SOUTHERN DISTRICT OF NEW YORK